

# GRAY ROBINSON

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August 17, 2021

## VIA ECF

The Honorable Victor Marrero  
 United States Courthouse for the Southern District of New York  
 500 Pearl Street, Suite 1610  
 New York, New York 10007

Re: *Rosenfield & Co., PLLC v. Trachtenberg, Rodes & Friedberg, LLP, et al.*  
 Case No. 1:21-cv-3858 (VM)

Dear Judge Marrero:

This office has the pleasure of representing Plaintiff, Rosenfield & Company, PLLC ("Rosenfield"), in the above-entitled case.

Rosenfield respectfully requests 21-day extension of time, through and including September 10, 2021, to respond to the Counterclaims filed by Defendants Star Auto Sales of Bayside, Inc., Star Auto Sales of Queens, LLC, Star Hyundai LLC, Star Nissan, metro Chrysler Plymouth Inc., Star Auto Sales of Queens County LLC, and Star Auto Sales of Queens Village LLC (collectively referred to hereinafter as "Star Auto Group"). Rosenfield's deadline to respond to Star Auto Group's Counterclaims is currently August 20, 2021. As required by your Honor's Individual Practices, Rosenfield has drafted correspondence, which will be sent under separate cover, to Star Auto Group's counsel, identifying pleading deficiencies that Rosenfield contends warrant dismissal of Star Auto Group's Counterclaims. Rosenfield seeks this extension of time in an abundance of caution should the parties be unable to resolve the issue concerning the appropriateness of filing a motion to dismiss. This is Rosenfield's first request for an extension of time to respond to Star Auto Group's Counterclaims, and counsel for Star Auto Group consents to this request for extension of time.

If you have any questions, please have your Judicial Assistant contact me. Thank you for your consideration.

Respectfully submitted,

*Lesley - A Marks*

cc: Counsel of Record (via ECF)

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**Request GRANTED.**

Rosenfield's response to the counterclaims is hereby due no later than September 24, 2021.

**SO ORDERED.**

September 10, 2021

DATE

*[Signature]*  
 VICTOR MARRERO, U.S.D.J.